

## UNITED STATES DISTRICT COURT

WESTERN

DISTRICT OF

VIRGINIA AT CHARLOTTESVILLE

NICOLE P. ERAМО

## EXHIBIT AND WITNESS LIST

V.

ROLLING STONE LLC et al

Case Number: 3:15CV00023

PRESIDING JUDGE Hon Glen Conrad					PLAINTIFF'S ATTORNEY Tom Clare, Libby Locke, A. Phillips....	DEFENDANT'S ATTORNEY Elizabeth McNamara, David Paxton....
TRIAL DATE (S) 10/17/2016 - 11/4/106-Liability Phase					COURT REPORTER JoRita Meyer/Lance Boardman	COURTROOM DEPUTY Susan Moody
DESCRIPTION OF EXHIBITS* AND WITNESSES						
1	-125	10/18/2016	Yes	Yes	PLAINTIFF'S UNCONTESTED EXHIBITS 1 - 125 admitted by Stipulation of Parties (See Index)	
126		10/18/2016	Yes	Yes	(P201) Audio from Call placed by Nicole to Jackie re Cville Detective	Nicole P. Eramo
	1-44	10/18/2016	Yes	Yes	DEFENDANTS' UNCONTESTED EXHIBITS 1-44 admitted by Stipulation of Parties (See Index)	
127		10/18/2016	Yes	Yes	(P25) Cavalier Daily Letters	Eramo
128		10/18/2016	Yes	Yes	(P602) Raff to Eramo email dated 11/20/14	Eramo
129		10/18/2016	Yes	Yes	(P609) Eramo forwarded email 11/22/2014 FW: Dean of Rape	Eramo
130		10/18/2016	Yes	Yes	(P689) Eramo forwarded email 11/22/2014 FW: Despicable	Eramo
131		10/18/2016	NOT	ADM	(P617) Tweet	Marked/Not Admitted
	45	10/18/2016	Yes	Yes	(D95) UVA Policy and Procedures for Student Sexual Misconduct Complaints	Eramo
	46	10/19/2016	Yes	Yes	(D65) Series of Text Messages involving Eramo 9 pages Oversized	Eramo
	47	10/19/2016	Yes	Yes	(D71) WUVA Video interview w/ Eramo	Eramo
	48	10/19/2016	Yes	Yes	(D233) Transcript of WUVA Video Interview w/ Eramo	Eramo
	49	10/19/2016	Yes	Yes	(D221) Emails between Eramo & "Jackie" 9/20/14 -10/8/14	Eramo
	50	10/19/2016	Yes	Yes	(D61) Series of Text Messages (Renda) involving Eramo 5 pages Oversized	Eramo
	51	10/19/2016	Yes	Yes	(D68) 5/21/2015 Cover and Letter/Rolling Stone Magazine	Eramo
	52	10/19/2016	Yes	Yes	(D305) Note to Eramo by Marsh Pattie	Eramo
	53	10/19/2016	Yes	Yes	(D319) Note from Sullivan to Eramo	Eramo
	54	10/19/2016	Yes	Yes	(D316) Email 12/8/14 from Groves to Eramo	Eramo
	55	10/19/2016	Yes	Yes	(D312) Email 11/25/14 from Eramo FW CNN interview request	Eramo
	56	10/19/2016	Yes	Yes	(D21) Letter dated 6/11/15 by Groves to Eramo	Eramo
	57	10/19/2016	Yes	Yes	(D244) Cavalier Daily 9/11/15 Article by Parker	Eramo
	58	10/19/2016	NOT	ADM	(D28) 1/6/2016 Open Letter by NOW to President Sullivan	Marked/Not Admitted

\* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

## EXHIBIT AND WITNESS LIST – CONTINUATION

NICOLE P. ERAMO vs. ROLLING STONE LLC et al					CASE NO. 3:15CV00023
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
	59	10/19/2016	Yes	Yes	(D22A) Series of Text exchanges Eramo/Renda Eramo
	60	10/19/2016	NOT	ADM	(P476) Statement by Sabrina Erdely in email dated 4/5/15 Marked/Not Admitted
132		10/19/2016	Yes	Yes	(P125) Postcard from Emily Renda to Nicole Eramo Emily Renda Depo
133		10/19/2016	Yes	Yes	Video CD of Emily Renda Deposition as played in open court Emily Renda
134		10/19/2016	Yes	Yes	(P491) Intimate Intimidation 1996 Sabrina Rubin Erdely
135		10/19/2016	Yes	Yes	(P492) The Crime Against Women That No One Understands -Self 2008 Erdely
136		10/19/2016	Yes	Yes	(P493) Sex Lies and Phys Ed - Rolling Stone 2009 Erdely
137		10/19/2016	Yes	Yes	(P494) The Catholic Church's Secret Sex Crime Files - Rolling Stone 2011 Erdely
138		10/19/2016	Yes	Yes	(P495) The Rape of Petty Officer Blumer - Rolling Stone 2013 Erdely
139		10/20/2016	Yes	Yes	(P5) Columbia Journalism Report as reprinted in Rolling Stone Erdely
140		10/20/2016	Yes	Yes	(P130) 9/2/14 emails exchanged between Erdely and Renda Erdely
141		10/20/2016	Yes	Yes	(P399) Mid December 2014 Erdely draft notes Erdely
142		10/20/2016	Yes	Yes	(P27) emails exchanged between Erdely and Pinkleton 10/24/14 Erdely
143		10/20/2016	Yes	Yes	(P75) Dana -Erdely and Farhi-Erdely email exchanges from 11-30-14 to 12-1-14 Erdely
144		10/20/2016	Yes	Yes	(P24) Paul Farhi 12/1/14 Article "Author of Rolling Stone article on alleged....." Erdely
145		10/20/2016	Yes	Yes	(P423) Erdely-Woods email exchange 10/25-26/2014 Erdely
146		10/20/2016	Yes	Yes	(P320) 10/1/2014 Erdely - Lecca email exchange Erdely
	61	10/21/2016	Yes	Yes	(P209) *****SEALED***** No public display - undredacted photo of :"Jackie" Erdely
	62	10/21/2016	Yes	Yes	(D231) Erdely's research file /news stories re Hannah Graham disappearance Erdely
	63	10/22/2016	Yes	Yes	(D333) Draft of Erdely Statement in defense of story att'd to email/never published Erdely
JNT	EX 1	10/24/2016	Yes	Yes	Joint Stipulation re: Indemnity and Cooperation Agreement/Erdely/Rolling Stone Erdely
147		10/24/2016	NOT	ADM	(P477) Email from Erdely to "Jackie" 12/17/2014 Erdely
148		10/24/2016	NOT	ADM	(P10) Letter by McNamara to Clare dated 12/30/2014 Erdely
	64	10/24/2016	Yes	Yes	(P's Trial Ex 10) as admitted by Stipulation 10/18/16) Less Redacted Version Notes Erdely
149		10/24/2016	Yes	Yes	**SEALED** No public display of video"Jackie" Depo Excerpts See also P163/P164 "Jackie"
150		10/24/2016	Yes	Yes	(P149) Redacted series of text messages exchanged between "Jackie" /Sara Surface Stipulation
151		10/24/2016	Yes	Yes	(P174) Series of text messages exchanged between "Jackie" and Ryan Duffin -Depo Stipulation

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152		10/24/2016	Yes	Yes	(P191) Email exchange between "Jackie" & Elizabeth Fox	Jackie Depo Ex	Stipulation
	65	10/24/2016	Yes	Yes	(D332) Jackie related excerpts from Erdely reporting file	Jackie Depo Ex	Stipulation
	66	10/24/2016	Yes	Yes	(D171) 09/18-12/10/2014 Jackie texts with Rachel Soltis	Jackie Depo Ex	Stipulation
153		10/24/2016	Yes	Yes	(P363) Oversized Word Document w/ Edits -see also P42		Elisabeth Garber-Paul
154		10/24/2016	Yes	Yes	(P40) Oversized Round One Galley Proof w/ Edits -see also P43		Garber-Paul
155		10/24/2016	Yes	Yes	(P39) Oversized Final Galley Proof w/ Edits - see also P45		Garber-Paul
156		10/24/2016	Yes	Yes	(P362) Email exchange between Sean Woods and E. Garber Paul 12/11/14		Garber-Paul
157		10/24/2016	Yes	Yes	(P281) Email exchange between Andy Young and Garber-Paul 3/23/15		Garber-Paul
	67	10/25/2016	Yes	Yes	(D142 ) Timesheets for Factchecking		Garber-Paul
	68	10/25/2016	Yes	Yes	(D266) 11/7/14 Email exchange between Garber-Paul and de Bruyn		Garber-Paul
	69	10/25/2016	Yes	Yes	(D264) Nov 2014 Email Exchange between Garber-Paul and S. Daniel Carter		Garber-Paul
	70	10/25/2016	Yes	Yes	(D282) Email Exchange between Garber-Paul and Laura Dunn		Garber-Paul
158		10/25/2016	Yes	Yes	(P610) Email Exchange between Gomes/Eramo		Garber-Paul
	71	10/26/2016	Yes	Yes	(D43) Gomes Eramo McCance Email exchange 9/9/14		Allen Groves
	72	10/26/2016	Yes	Yes	(D19) Saunders Burke Groves Email exchange re UVA Mag Photo Shoot		Groves
	73	10/26/2016	Yes	Yes	(D41) Groves' edits to UVA Mag article		Groves
	74	10/26/2016	Yes	Yes	(D39) Email exchange 10/27/14 Molly Minturn to Eramo re UVA Mag Article		Groves
	75	10/26/2016	Yes	Yes	(D40) Groves to Minturn and others 10/27/14		Groves
	76	10/26/2016	Yes	Yes	(D38) 10/13/14 Email thread to Eramo/Groves and others		Groves
	77	10/26/2016	Yes	Yes	(D249) Executive Summary - Interim Policy on Sexual and Gender Based Harrassment		Groves
	78	10/26/2016	Yes	Yes	(D250) Interim Policy on Sexual and Gender Based Harrassment.....		Groves
	79	10/26/2016	Yes	Yes	(D36) 12/17/14 Email by U.Va. Atty Kast to "Jackie"s Atty w/ Stmt att'd		Groves
159		10/26/2016	Yes	Yes	Kathryn Hendely Video Designated Deposition as played in open court		Kathryn Hendley
160		10/26/2016	Yes	Yes	Transcript of Kathryn Hendely Video Designated Deposition as played in ct		Stipulation
161		10/26/2016	Yes	Yes	Ryan Duffin Video Designated Deposition as played in open court		Ryan Duffin
162		10/26/2016	Yes	Yes	Transcript of Ryan Duffin Video Designated Deposition as played in ct		Stipulation
163		10/26/2016	Yes	Yes	Audio Only Version of "Jackie" designated depo as played in open ct. P 14 9		Stipulation

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164		10/26/2016	Yes	Yes	Transcript of "Jackie" designated depo as played in open ct. P 149		Stipulation
165		10/26/2016	Yes	Yes	Transcript of Emily Renda Video Depos as played @ PLTF 133 in court		Stipulation
	80	10/26/2016	Yes	Yes	(D57) Email Exchange between Alex PPinkleton and Herbert Braun 10/30/14	Alex Pinkleton	
	81	10/26/2016	Yes	Yes	(D59) Email exchange between Pinkleton and Braun 11/22/2014		Pinkleton
	82	10/26/2016	Yes	Yes	(D 240) Notecard sent by Pinkleton to Eramo		Pinkleton
166		10/26/2016	Yes	Yes	John Ritter Video Deposition as designated and played in open court		John Ritter
167		10/26/2016	Yes	Yes	Transcript of John Ritter Video Deposition as designated and played in open court		Stipulation
168		10/26/2016	Yes	Yes	(P298) 1 of 3 illustartions in sequence -Eramo -Ritter Dep		Stipulation
169		10/26/2016	Yes	Yes	(P300) 2 of 3 Illustrations in sequence - Eramo w/ Student Ritter Dep		Stipulation
170		10/26/2016	Yes	Yes	(P301) 3 of 3 Illustrations in sequence - Eramo w/ Student/ w/ Protest Signs Ritter Dep		Stipulation
171		10/26/2016	Yes	Yes	(P564) Ritter to Maltais 11/13/14 email Ritter Dep		Stipulation
172		10/26/2016	Yes	Yes	(P574) Bearded Man Illustrations marked 'Cleveland Five Rolling Stone' Ritter Dep		Stipulation
173		10/26/2016	Yes	Yes	(P576) Illustration dog at locker w/ policeman, female Ritter Dep		Stipulation
174		10/26/2016	Yes	Yes	(P577) Illustration - 3 men w/ Car Ritter Dep		Stipulation
175		10/26/2016	Yes	Yes	(P578) Illustration - Sailor Ritter Dep		Stipulation
176		10/26/2016	Yes	Yes	Illustration - Wolverine from Ritter Deposition		Stipulation
177		10/27/2016	Yes	Yes	(D424) Erdely /Woods Email Exchange 11/3/14		Sean Woods
178		10/27/2016	Yes	Yes	(D408) Woods/Judith Shulevitz Email Exchange 12/1/14		Woods
179		10/27/2016	Yes	Yes	(D420) Fahri/Woods Email Exchange 11/28/14		Woods
180		10/27/2016	Yes	Yes	(D85) Erdely/Woods Email Exchange 12/2/14		Woods
181		10/27/2016	Yes	Yes	(P48) Melissa Bruno email w/ Press Release to Media Outlets undated		Woods
182		10/27/2016	Need	Yes	Woods/Erdely Email Exchange re WYNC Lehrer Show Interview 11/26/14		Woods
183		10/27/2016	Yes	Yes	(P409) Farhi/Woods Email Exchange 12/1/14		Woods
184		10/27/2016	Yes	Yes	(P407) Woods/Hanna Rosin Email Exchange 12/2/14		Woods
185		10/27/2016	Need	Yes	Disc of Audio of Woods Voicemail left for "Jackie" 12/8/14		Woods
	83	10/27/2016	Yes	Yes	Subpoena issued 11/5/15 to Sara Surface		Sara Surface
186		10/28/2016	Yes	Yes	Designated Video Deposition of Jann Wenner Excerptps		Jann Wenner

## **EXHIBIT AND WITNESS LIST – CONTINUATION**